

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

TSDC, LLC,) CASE NO. 1:14-cv-02552-CAB
)
Plaintiff,) JUDGE CHRISTOPHER A. BOYKO
)
v.)
)
CHOOSE HOPE, INC.,) JOINT MOTION TO STAY CASE
) PENDING SETTLEMENT
Defendant.) DISCUSSIONS

All parties in this case, by and through undersigned counsel, hereby move the Court for an Order staying this case, including all current deadlines for filing of pleadings and conducting discovery, pending ongoing settlement discussions. The parties are actively involved in settlement discussions, including a recent in-person meeting and follow-up talks. Ultimately, the parties hope to reach a settlement agreement, but require more time to do so. In the interest of judicial economy and in order to minimize further litigation costs, the parties respectfully ask this Court to stay all current proceedings. If settlement discussions prove unsuccessful, the parties will promptly notify the Court and will request that the Court hold a scheduling conference to set new deadlines in this case, including, but not limited to, new deadlines for the filing of Plaintiff's Reply to Defendant's Amended Counterclaim, discovery cut-off, and dispositive motions. The parties submit that this Joint Motion is not interposed for purposes of delay.

Respectfully submitted,

/s/ Kurt D. Anderson (per consent)

KURT D. ANDERSON (0046786)

kanderson@cruglaw.com

COLLINS, ROCHE, UTLEY & GARNER,
LLC

800 Westpoint Parkway, Suite 1100

Cleveland OH 44145

(216) 916-7730 (T)

(216) 916-7725 (FAX)

Counsel for Defendant Choose Hope, Inc.

/s/ Katya S. Cronin

Katya S. Cronin (0092765)

TUCKER ELLIS LLP

950 Main Avenue,
Suite 1100

Cleveland, OH 44113-7213

Telephone: 216.592.5000

Facsimile: 216.592.5009

E-mail: katya.cronin@tuckerellis.com

Counsel for Plaintiff TSDC, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this October 23, 2015, a copy of the foregoing JOINT MOTION TO STAY CASE PENDING SETTLEMENT DISCUSSIONS was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Katya S. Cronin _____

Katya S. Cronin (0092765)

Tucker Ellis LLP

950 Main Avenue

Suite 1100

Cleveland, OH 44113-7213

Tel: 216.592.5000

Fax: 216.592.5009

E-mail: katya.cronin@tuckerellis.com

Counsel for Plaintiff TSDC, LLC